

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA }
v. } NO. 1:21-CR-00088-JL
COREY DONOVAN }

STATUS REPORT OF COUNSEL RE:
STATUS AND TO EXTEND THE DEADLINE

Now comes counsel for the defendant, Donna J. Brown, and hereby submits this status report pursuant to this Court's Order of January 10, 2025.

Undersigned counsel filed a status report on May 16, 2025 and will not repeat the background and facts set forth in that pleading. In that pleading, undersigned counsel emailed counsel for the Government, Charles L. Rombeau, inquiring about an update on discovery that is the subject of the defendant's pro se motion. Attorney Rombeau has not responded to that inquiry as of the filing of that pleading.

The next status report in this case is due today, June 18, 2025. Prior to today's date, undersigned counsel had not heard back from the prosecutor or the defendant regarding this issue. The defendant did call undersigned counsel this morning, June 18, 2025, and explained that he had not been able to call for over a month due to his being in lockdown. After undersigned counsel received the call from the defendant, she received an email from the government. The government stated that they needed more information from Mr. Donovan to follow up on the relevant discovery issues. Therefore, undersigned requests this court further extend this matter for an additional 30 days so that undersigned counsel can speak with the defendant about the information she received from the government on today's date.

Respectfully submitted,

Corey Donovan

By His Attorney,

Date: June 18, 2025

/s/ Donna J. Brown
Donna J. Brown
N.H. Bar No. 387
Wadleigh, Starr & Peters
95 Market St
Manchester, NH 03101
Tel. (603) 669-4140
E-mail: dbrown@wadleighlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2025, the above notice was served electronically through CM/ECF upon all counsel of record.

/s/ Donna J. Brown
Donna J. Brown #387